

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA**

**ALFA LIFE INSURANCE
CORPORATION**

Plaintiff,

v.

**ADVANTAGE CONSULTING
GROUP, INC. AND RICHARD E.
KNUTSON**

Defendants.

**Civil Action No.:
CV-05-775-MHT**

PLAINTIFF'S EXPERT WITNESS DISCLOSURE

Pursuant to Federal Rules of Civil Procedure 26(a)(2), Plaintiff Alfa Life Insurance Corporation ("Alfa") discloses that it intends to call the following witness as an expert and fact witness at trial:

Forrest Black
L & J Insurance Systems Corporation
128 Lake Stephens Road
Canton, MS 39046
(601) 855-0147

Mr. Black's résumé is attached hereto as Exhibit "A." In summary format, Mr. Black is expected to offer the following opinions:

1. ACG made gross errors in estimating the time to complete conversion in its GAP analysis.
2. ACG did not provide adequately skilled personnel and failed to perform the conversion according to professional standards that one would expect in the industry.

3. Converting insurance policy information from CFO to Ingenium is materially different from, and significantly more difficult than, converting from Life70 to Ingenium.

4. But for the results of the rate book conversion, ACG left nothing of value with Alfa at the end of its three-plus years at Alfa.

5. Black has had no trouble working with Vicki Herrin or Alfa Life Insurance Corporation in accomplishing the conversion.

To support his opinions, Mr. Black relies upon his personal experience and knowledge of the life insurance electronic data systems industry. He has reviewed the Contract and Amended Contract between Plaintiff Alfa and Defendant Advantage Consulting Group, Inc. ("ACG"), the conversion issues log, and the source programs on Alfa's mainframe written by ACG. Mr. Black also has first-hand working knowledge of Alfa's data systems and the Ingenium system to which Alfa is converting its data, has access to the various files on Alfa's "W" drive, and is currently performing the data conversion services that ACG failed to complete. He has also reviewed the depositions of John Dortsch and Richard Knutson.

/s/ Douglas N. Robertson
Counsel for Alfa Life Insurance Corporation
3800 Colonnade Parkway, Suite 545
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CERTIFICATE OF SERVICE

I certify that on the 30th day of April 2007, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following

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